

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Higinio Mora  
Debtor,

Midwest Loan Services as servicer for FIRST  
HERITAGE FINANCIAL LLC  
Movant.

v.

Higinio Mora  
Debtor/Respondent,

Scott Waterman, Trustee  
Additional Respondent.

BANKRUPTCY CASE NUMBER  
23-11529-pmm

CHAPTER 13

**ENTRY OF APPEARANCE AND REQUEST FOR NOTICE**

Pursuant to Bankruptcy Rules 2002 and 9007, Bankruptcy Code §§102(1), 342, and 1109(b), FIRST HERITAGE FINANCIAL LLC, requests special notice of all matters which must be noticed to creditors, equity security holders, any creditors or other committees, and any other parties in interest whether sent by the Court, the Debtor, the Trustee, or any other party. This request includes not only the notices and papers referred to in the Rules above, but also includes, without limitation, Orders and notice of any Application, Motion, Petition, Pleading, Request, Complaint, and demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail delivery, telephone, telegraph, telex, facsimile or otherwise.

Respectfully submitted,

Dated: July 14, 2023

BY: /s/ Christopher A. DeNardo  
Christopher A. DeNardo 78447  
LOGS Legal Group LLP  
3600 Horizon Drive, Suite 150  
King of Prussia, PA 19406  
(610) 278-6800  
logsecf@logs.com

LLG File #: 22-066953

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**CERTIFICATE OF SERVICE**

I, Christopher A. DeNardo, an employee of the law firm of LOGS Legal Group LLP hereby certify that I caused to be served true and correct copies of Entry of Appearance and Request for Notice by First Class Mail, postage prepaid, at the respective last known address of each person set forth below on this 14<sup>th</sup> day of July, 2023:

Higinio Mora  
2412 S Carbon Street  
Allentown, PA 18103

David F. Dunn, Esquire  
21 South 9th Street  
Allentown, PA 18102  
dunncourtpapers@choiceonemail.com - VIA ECF

Scott Waterman, Trustee  
Chapter 13 Trustee  
2901 St. Lawrence Avenue, Suite 100  
Reading, PA 19606  
ecfmail@readingch13.com - VIA ECF

I HEREBY CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS  
TRUE AND CORRECT.

/s/ Christopher A. DeNardo

Christopher A. DeNardo 78447

LOGS Legal Group LLP

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King of Prussia, PA 19406

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